IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

2016 MAR -9 PM 3: 21

UNITED STATES OF AMERICA

SECOND SUPERSEDING INDICTMENT

V.

Case No. 15-cr-132-jdp 18 U.S.C. §2252(a)(4)(B)

RICHARD GEASLAND,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about October 6, 2015, in the Western District of Wisconsin, the defendant, RICHARD GEASLAND,

knowingly possessed a WD 500GB hard drive, housed in a Rosewill external data storage case, containing visual depictions that had been produced using materials that had been shipped and transported in interstate and foreign commerce, specifically the WD external hard drive, and the production of such visual depictions involved the use of minors engaging in sexually explicit conduct, and the depictions are of such conduct.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B)).

FORFEITURE ALLEGATION

As a result of the offense charged in Count 1 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2252(a)(4)(B), pursuant to Title 18, United States Code, Section 2253, the defendant,

RICHARD GEASLAND,

shall forfeit to the United States his right, title, and interest in:

- (1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained; and
- (2) The property used or intended to be used to commit or to promote the commission of the aforementioned offense, specifically described as a WD external hard drive, S/N WCC1S0662390.

A TRUE BILL

PRESIDING JUROR

JOHN W. VAUDREUIL United States Attorney

Indictment returned: 3-9-16